

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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SPARTAN BUSINESS SOLUTIONS LLC  
D/B/A SPARTAN CAPITAL,

*Plaintiff,*

23 Civ.

-- against --

**NOTICE OF REMOVAL**

MARQUIS CATTLE COMPANY INC.  
D/B/A MARQUIS CATTLE COMPANY;  
MONTANA MOUNTAIN BISON, INC.;  
MCC TRUCKING LLC;  
M HANGING 6 RANCH LLC D/B/A PUMP'T;  
MARQUIS CATTLE INC. and  
CORY SHANNON MARQUIS,

*Defendants.*

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**PLEASE TAKE NOTICE THAT**, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, the Defendants – Marquis Cattle Company Inc. d/b/a Marquis Cattle Company; Montana Mountain Bison, Inc.; MCC Trucking LLC; M Hanging 6 Ranch LLC d/b/a Pump't; Marquis Cattle Inc. and Cory Shannon Marquis – by and through their attorneys, hereby remove this action to the United States District Court for the Western District of New York.

Defendants respectfully state the following grounds for removing this action:

1. Marquis Cattle Company Inc. d/b/a Marquis Cattle Company; Montana Mountain Bison, Inc.; MCC Trucking LLC; M Hanging 6 Ranch LLC d/b/a Pump't; and Marquis Cattle Inc. ("Corporate Defendants"), and Cory Shannon Marquis ("Individual Defendant") are defendants in a civil action entitled *Spartan Business Solutions LLC v. Marquis Cattle Company Inc et al.* pending in the Supreme Court of New York, County of the Monroe ("State Court Action").
2. Plaintiff is a citizen of the state of New York.
3. Corporate Defendants are citizens of the state of Montana.

4. Individual Defendant is a citizen of the state of Montana.
5. Plaintiff filed the State Court Action on March 30, 2023.
6. Plaintiff seeks \$239,886.26 plus interest, costs, disbursements and attorney's fees.
7. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1332 because the parties are completely diverse and the amount in controversy exceeds \$75,000.
8. Pursuant to 28 U.S.C. § 1446(d), Defendants will promptly give written notice of the removal to federal court of the State Court Action to Plaintiff.
9. This Notice of Removal to Plaintiff's counsel of record and will file a copy of this Notice of Removal with the clerk of the state court in which the NY State Court Action is pending.
10. WHEREFORE, Defendants request that this civil action be removed from the Supreme Court of the State of New York, County of Monroe, to the United States District Court for the Western District of New York.

Dated: Rochester, NY  
May 10, 2023

/s/ Brian Goodwin  
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*Attorney for Defendants*

/s/ David Kasell  
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*Attorney for Defendants  
(pro hac vice pending)*

To: Jason A. Gang, Esq.  
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*Attorneys for Plaintiff*